

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF ADVO, INC.  
AND MOTION FOR EXTENSION OF TIME  
(ADVO/USPS-4,6-18)  
(September 29, 1997)

The United States Postal Service hereby provides responses to the following interrogatories of Advo, Inc.: ADVO/USPS-4,6-18 filed on September 15, 1997. Each interrogatory is stated verbatim and is followed by the response.

The Postal Service additionally requests an extension of time to file a response to ADVO/USPS-5 and 19. The personnel required to compile the response to these discovery requests have been unavailable, but we anticipate that a response will be provided by Friday, October 3. We regret any inconvenience involved in this late response, but do not consider that any participant will be prejudiced by it.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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September 29, 1997

U.S. POSTAL SERVICE RESPONSE TO INTERROGATORIES  
OF ADVO INC.

ADVO/USPS-4 (revised). For the last half of FY96, and for the first half of FY97, please provide Standard A Regular Rate Enhanced Carrier Route pieces and weight, broken down by non-destination, DBMC, DSCF, and DDU, for each of the following rate categories:

- a. Automation letters
- b. Basic letters
- c. High-density letters
- d. Saturation letters
- e. Basic non-letters at the piece rate
- f. High density non-letters at the piece rate
- g. Saturation non-letters at the piece rate
- h. Basic non-letters at the pound rate
- i. High density non-letters at the pound rate
- j. Saturation non-letters at the pound rate

Please provide this information in machine readable format (e.g., Lotus 123 or Excel).

RESPONSE.

Please see USPS LR-H-284.

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ADVO/USPS-6. The DMM Quick Service Guide 630, defines a Standard non-automation letter as having the following dimensions:

- Minimum: 3-1/2 inches high, 5 inches long, and .007 inch thick.
- Maximum: 6-1/8 inches high, 11-1/2 inches long, and 0.25 inch thick.

Please confirm the following or provide the correct dimensions:

- a. These are the dimensions for the ECR letter rate categories
- b. These are the letter dimensions for the IOCS data collection.

RESPONSE:

- a. Confirmed.
- b. Confirmed.

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ADVO/USPS-7. The DMM Quick Service Guide 643 defines ECR non-letters and flats as having the following dimensions:

- Minimum: more than 6-1/8 inches high, or 11-1/2 inches long, or 0.25 inch thick.
- Maximum: 11-3/4 inches high, 14 inches long, and 0.75 inch thick.

Please confirm the following or provide the correct dimensions:

- a. These are the dimensions for the ECR non-letter rate categories.
- b. These are the flat dimensions for the IOCS data collection.

RESPONSE:

- a. Not confirmed. Merchandise samples can exceed these dimensions as described in DMM Quick Service Guide 643.
- b. Not confirmed. For IOCS data collection, maximum dimensions for a flat are 12 inches high, 15 inches long, and 0.75 inch thick.

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ADVO/USPS-8. Please provide the dimensions for purposes of rate categories and billing determinants for following:

- a. ECR flats.
- b. ECR non-letters, non-flats.

RESPONSE:

- a.
  - Minimum: more than 6-1/8 inches high, or 11-1/2 inches long, or 0.25 inch thick.
  - Maximum: 11-3/4 inches high, 14 inches long, and 0.75 inch thick.
- b. There is currently no rate category for this grouping of mail.

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ADVO/USPS-9. Does the USPS accept ECR mail that is less than the DMM letter minimums? If so, please describe such mail and explain how it is classified for purposes of (a) shape and rate categories/billing determinants, and (b) IOCS data collection.

RESPONSE:

- a. ECR mail is subject to the minimum General Mailability Standards in DMM C010.1 2. These minimum standards are the same as the letter-size mail processing category as defined in C050.2.0. These minimums apply to letter-rated ECR mail.
- b. Not applicable.

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ADVO/USPS-10. Please confirm the following or explain fully why you cannot:

- (a) DMM-defined flats are sometimes cased by city carriers into letter cases.
- (b) DMM-defined letters are sometimes cased by city carriers into flat cases.
- (c) DMM-defined parcels are sometimes cased by city carriers into flat cases.

Response:

- (a) Confirmed.
- (b) Confirmed.
- (c) Confirmed.

## RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF ADVO

ADVO/USPS-11. USPS Handbook F-56 (Rural Carrier Route Test Instructions) states that letter-shape mail is anything 5 inches or less wide and 3/8 inch or less thick, and flat-shape mail is any mailpiece that exceeds the 5-inch maximum width of a letter. With respect to the Handbook and the rural CCS, please explain the following:

- (a) Does the Special Count of Mail identify as a letter anything 5 inches or less high, or does it also require that the piece be equal to or less than .375 inch thick? Please explain.
- (b) What shape is assigned to mail that less than 5 inches long (and less than 5 inches high/less than .375 inch thick) categorized?
- (c) What shape is assigned to mail that is less than 5 inches high but more than .375 inch thick?

Response:

- (a) The Special Count of Mail referred to on page 57 of Handbook F-56 is the National Count of Mail, also referred to as the Rural Mail Count. Section 535.12 of Postal Bulletin 21952, dated 8/14/97 (supplied as Attachment I with the response to MPA/USPS-T17-12a) defines letter size mail for purposes of the National Count of Mail. The note in this section states that "The maximum thickness of 3/8 inch applies only to small magazines and small catalogs. Letter-size mail is mail that fits in the width of the case separation in use, regardless of thickness."
- (b) Handbook F-56 defines mail that is less than 5 inches long and less than 5 inches high and less than .375 inch thick as a letter.

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(c) Handbook F-56 defines a piece of this size as a flat, as long as the piece is not rigid and exceeds either 18 inches in length or 1-9/16 in width. In this case it would be counted as a parcel.

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ADVO/USPS-12. USPS Handbook F-56 (Rural Carrier Route Test Instructions) states that flat mail is any mailpiece that exceeds the 5-inch maximum width (height), and parcel mail is any article that exceeds any one of the following dimensions: 5 inches high, 18 inches long, and 1-9/16 inches wide. The Handbook appears to define flats as anything exceeding the 5-inch height maximum for letters and to define parcels (under one definition) as any article that exceeds the 5 inch height dimension.

- (a) Please explain fully how flats and parcels are distinguished from each other for purposes of the rural carrier CCS.
- (b) What shape is assigned to mail that is 5.1 inches high, 6 inches long, and .375 inch thick?

Response:

- (a) *Flats pieces include newspapers, magazines, catalogs, rolls, and other pieces exceeding letter-size dimensions (5 inches high and .375 inches wide) that can be cased for delivery. If the piece is a rigid article and exceeds 5 inches in height, 18 inches in length, or 1-9/16 inches in width, then the piece is counted as a parcel. If the piece is non-rigid, but cannot fit in the separations in the mail case, then the piece is counted as a parcel.*
- (b) This piece will be counted as a flat.

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ADVO/USPS-13. What are the dimensions for letters, flats, and parcels for purposes of the rural carrier Special Mail Count? Please provide some examples to clarify the differences.

Response:

Please see Attachment I provided with the response to MPA/USPS-T17-12a.

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ADVO/USPS-14. Witness Hume's Worksheet R shows total adjusted letter volume of 17,009,241.2 and total adjusted flat volume of 15,242,494.8. However, LR H-193 shows total adjusted letter volume of 19,105,377 and total adjusted flat volume of 13,146,349. Please explain the differences in adjusted letters and adjusted flat volumes for Hume worksheet R and p. 9 of LR H-193.

Response:

The figures 17,009,241.2 (total adjusted letter volume) and 15,242,494.8 (total adjusted flat volume) in Witness Hume's Worksheet R are out-of-date remnants from a developmental version of the worksheet. The correct letter and flat totals are those in LR H-193. However, none of the totals is used or has any bearing on the computations of the worksheet in Witness Hume's testimony; they exist solely as a result of the download process used to gather the data of Sheet R from the Cost Segment workpaper RDGOVADJ.

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ADVO/USPS-15. Please confirm that the LR H-193 adjusted letter and flat volumes are used to distribute the rural carrier letter and flat costs. If this is incorrect, please provide the correct volumes and identify their source.

Response:

Confirmed.

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ADVO/USPS-16. Please provide the correct adjusted Rural CCS volumes for parcels and boxholders that were used as the distribution key for volume-variable rural carrier costs (Alexandrovich Cost Segment 10 worksheets).

Response:

These Rural CCS volumes for all shapes, including parcels and boxholders, have been provided in LR H-201. See worksheet RDGOVADJ.

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ADVO/USPS-17. Please confirm that the rural CCS volumes were collected as described in LR H-25 (Handbook F-55) and H-89 (Rural CCS). If not please explain why not and provide a description of how they were collected and all documentation related to that collection process.

RESPONSE:

Not confirmed. Presuming that you are referring to Handbook F-56, Rural Carrier Route Test Instructions, instead of F-55, to the best of our knowledge, rural CCS volumes were collected as described in F-56. It should be noted that Library Reference H-13, Statistical Programs Guidelines, Special Classification Reform, contains information concerning the collection of mail volumes after classification reform. Library Reference H-13 was utilized as an aid for data collection activities for only the time period after July 1, 1996.

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ADVO/USPS-18. Referring to the National Mail Count data from LR H-192, please provide the following:

- (a) The specific dates of the data collection.
- (b) The proportion of evaluated routes that participated in the count.
- (c) The proportion of other routes that participated in the count.
- (d) A description of how evaluated and other routes were chosen to participate in the count.

Response:

- (a) The National Mail Count took place from September 11, 1995 through October 7, 1995.
- (b) 71% of evaluated routes participated in the count.
- (c) 72% of other routes participated in the count.
- (d) An evaluated or other route participated in the count at the request of either management or the carrier.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
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September 29, 1997